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VIA ECF

The Honorable Judge Merkl
United States District Court
Eastern District of New York
225 Cadman Plaza
Brooklyn, NY 11201

Re: FTS Capital, LLC v. Stuyvesant Construction Corp. et al
Docket No. 19-CV-7275 (DLI) (CLP)

Dear Honorable Judge Merkl:

My office represents FTS Capital, LLC, in the above-referenced action. This letter is submitted jointly by both Plaintiff and Defendant Stuyvesant Construction Corp. Due to a scheduling conflict, Plaintiff's witness, Benjmain Verdooren, will no longer be able appear in person on 12/4/24. He has a court ordered appearance in Superior Court of California, County of Los Angeles. The parties have agreed to submit Mr. Verdooren's deposition transcript to the court in place of his testimony. The parties have stipulated to submit Mr. Verdooren's deposition transcript to the court in place of his testimony pursuant to FRCP 32.

Should Court require Mr. Verdooren's testimony in place of his deposition transcript, he is available to appear virtually on December 4, 2024.

Thank you for your time and attention to this matter.

Respectfully submitted,

/s/Rafi Hasbani
Rafi Hasbani, Esq.